

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE: ASBESTOS PRODUCTS
LIBABILITY LITIGATION (No. VI)**

MDL Docket No. 875

**ROGER L. DINGESS and
REBECCA DINGESS, his wife,
Plaintiffs,**

Docket No. 2:07-cv-62864-ER

v.

**BORG-WARNER AUTOMOTIVE, INC., et al.,
Defendants.**

MOTION FOR SUBSTITUTION OF COUNSEL

COMES NOW the defendant, General Motors Corporation [“GM”], and hereby moves the Court to withdraw Eric Falk as its counsel. The defendant, GM, further moves the Court to substitute counsel, J. Tyler Dinsmore and Michelle B. Hoosier, and the law firm of Flaherty, Sensabaugh and Bonasso, PLLC to represent its interests in the present case.

The defendant, General Motors Corporation, respectfully requests that this Court grant the withdraw of Eric Falk as its counsel of record and grant the substitution of counsel of J. Tyler Dinsmore and Michelle B. Hoosier to represent its interests. Defendant respectfully requests that the Court enter the Agreed Order of Substitution of Counsel attached hereto as Exhibit “A.”

GENERAL MOTORS CORPORATION
By Counsel

/s/ Michelle B. Hoosier
J. Tyler Dinsmore, Esquire (WV Bar No. 5823)
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/s/ Eric Falk
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CERTIFICATE OF SERVICE

I, Michelle B. Hoosier, counsel for the Defendant, hereby certify that on September 15, 2009, I electronically filed the foregoing “*MOTION FOR SUBSTITUTION OF COUNSEL*” with the Court using the CM/ECF system which will send notification of such filing to all known counsel of record.

/s/ Michelle B. Hoosier
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Michelle B. Hoosier, Esquire (WV Bar No. 10129)
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